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January 13, 2020

The Honorable Catherine C. Blake United States District Court Judge District of Maryland 101 West Lombard Street Baltimore, Maryland 21201

RE:

<u>U.S. v. Daniel Hersl.</u> CCB-17-00106 Request for Relief from Protective Order

Dear Judge Blake:

I am writing the Court requesting relief from the Protective Order. Mr. Hersl's trial and appeal have now been unsuccessfully concluded. He has requested on several occasions his complete files which I have stored in my office. His request includes all discovery provided by government counsel. He has requested these materials so that he may be able to prove his "innocence" and to prepare for filing a motion for Post-Conviction relief pursuant to 28 § 2255.

I have contacted government counsel Mr. Wise and he objects to disclosure of police reports and other protected discovery.

Respectfully submitted,

William B. Purpura

## **EXHIBIT I**